

United States Bankruptcy Court  
Eastern District of Virginia  
Richmond Division

IN RE: BCN#: 18-36375-KLP

GRANVILLE LEROY GREEN

Debtor(s) Chapter 7

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GRANVILLE LEROY GREEN

Debtor(s) **RESPONSE TO TRUSTEE'S  
MOTION TO SELL REAL  
PROPERTY**

v.

Wells Fargo Bank, NA  
and its assignees and/or  
successors in interests,  
Respondent/Secured Creditor

and

ROY M. TERRY, JR.

Respondent/Trustee

Gregory N. Britto, Esquire  
VSB #23476  
William M. Savage, Esquire  
VSB #26155  
Malcolm B. Savage, III, Esquire  
VSB #91050  
Thomas J. Gartner, Esquire  
VSB #79340  
Mary F. Balthasar Lake, Esquire  
VSB #34899  
Renee Dyson, Esquire  
VSB #93282  
SHAPIRO & BROWN, LLP  
501 Independence Parkway, Suite 203  
Chesapeake, Virginia 23320  
(703) 449-5800  
18-272477

Comes now Wells Fargo Bank, NA, by Counsel, and for its response to the Trustee's Motion to Authorize Private Sale of Real Property of the Estate Pursuant to 11 U.S.C. § 363 states as follows:

1. That Wells Fargo Bank, NA holds a first priority deed of trust secured by real property located at 9123 Colonnade Circle, Ashland, VA 23005.

2. That Wells Fargo Bank, NA consents to the sale of the real property located at 9123 Colonnade Circle, Ashland, VA 23005, which is secured by a deed of trust held by Wells Fargo Bank, NA, provided that there are sufficient proceeds to pay its underlying note and deed of trust in full through settlement.

3. Further, that Wells Fargo Bank, NA requests that all proceeds from the sale of the property be used to pay Wells Fargo Bank, NA in full, including its outstanding fees and costs due and owing at the date of settlement. Nothing contained herein shall prevent the Secured Creditor from proceeding to foreclosure upon obtaining relief from the Automatic Stay.

4. To the extent that the proceeds of the sale are insufficient to pay its underlying note and deed of trust in full including its fees and costs at settlement, then Wells Fargo Bank, NA is opposed to the Motion to Sell Real Property.

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Dated: 05/20/2019

SHAPIRO & BROWN, LLP

Attorneys for Wells Fargo Bank, NA

By: /s/ Mary F. Balthasar Lake

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Malcolm B. Savage, III, Esquire

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CERTIFICATE OF SERVICE

I certify that I have mailed true copies of the above mentioned response to Debtor's motion to sell real property by electronic or first class mail, postage pre-paid on the 20<sup>th</sup> day of May, 2019 to the following:

Granville LeRoy Green  
6289 Indian Trial Court  
Mechanicsville, VA 23111

- Debtor(s)

ROY M. TERRY, JR.  
P.O. BOX 2188  
RICHMOND, VA 23218-2188

- Trustee

Genene E. Gardner  
The Merna Law Group  
3419 Virginia Beach Blvd., #236  
Virginia Beach, VA 23452

- Debtors' Attorney

/s/ Mary F. Balthasar Lake

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